## UNITED STATES DISTRICT COURT

for the

Western District of Michigan

| United States of America v.  Adam Fox, Barry Croft, Ty Garbin, Kaleb Franks, Daniel Harris and Brandon Caserta |                  |                             | ) ) Case No. ) 1:20-mj-416 ) ) |                    |  |        |
|--|------------------|-----------------------------|--------------------------------|--------------------|--|--------|
|  | Defendant(s      | )                           |                                |                    |  |        |
|  |                  | CRIMINA                     | L COM                          | PLAINT             |  |        |
| I, the cor   | mplainant in thi | s case, state that the foll | lowing is tru                  | e to the best of n | ny knowledge and belief.   |        |
| On or about the o  | date(s) of       | June 2020 to the prese      | ent in                         | the county of _    | Kent and elsewhere   | in the |
| Western  | District of      | Michigan                    | , the defend                   | ant(s) violated:   |  |        |
| Code Section   |                  |                             | Offense Description            |                    |  |        |
| 18 U.S.C. § 120  | 1(c)             | Conspiracy to o             | commit kidna                   | apping             |  |        |
|  |                  | is based on these facts:    |                                |                    |  |        |
| <b></b> Conti  | nued on the atta | ached sheet.                | _                              |                    | Complainant's signature  RD TRASK, Special Agent  Printed name and title | t      |
| Sworn to before me and signed in my presence.  Date: October 6, 2020   |                  |                             |                                | S                  | ally Sero  |        |
| Date: October  | -,               | =                           | _                              |                    | Judge's signature  | -300   |
| City and state:  | Gra              | nd Rapids, Michigan         |                                | Sally J. B         | erens, U.S. Magistrate Juc<br>Printed name and title                     | lge    |